

LAW OFFICES OF K.C. OKOLI, P.C.

330 SEVENTH AVENUE, 15TH FLOOR
NEW YORK, NEW YORK 10001
(212) 564-8152

TELECOPIER (212) 268-3443

June 20, 2019

Via ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 12B
New York, New York 10007-1312

***Re: Luc R. Pierre v. City of New York, et al.
17-CV-05782 (JGK) (KNF)***

Dear Judge Koeltl:

I am attorney for the plaintiff in the above-referenced matter. I write with regret to ask that I supplement my declaration in opposition to the motion for summary judgment by filing one (1) exhibit which I inadvertently omitted to include in my declaration.

I also request that the declaration which is being filed simultaneously herewith with the aforesaid exhibit be deemed as properly filed. A copy of the exhibit with my declaration is attached to this application. I truly regret this omission which will not cause any undue prejudice to the defendants.

Thank you for your courtesy and consideration.

Respectfully submitted,


K.C. Okoli

cc: Ivan A. Mendez, Jr.
Assistant Corporation Counsel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
LUC R. PIERRE,

Case No. 17-CV-05782
(JGK) (KNF)

Plaintiff

-against-

THE CITY OF NEW YORK, SEUNGHWAN KIM,
JAMES COX, KATHERINE REILLY, LAUREN
JACOBSON, ADAM KARP and JUDITH BRUSGARD,

Defendants
----- X

SUPPLEMENTAL DECLARATION OF KENECHUKWU OKOLI

KENECHUKWU OKOLI, hereby declares as follows pursuant to 28 U.S.C. §1746:

1. I was a member of Law Offices of K.C. Okoli, P.C., attorneys for Luc R. Pierre, Plaintiff in this litigation.
2. I make this supplemental declaration to place before the court a discovery document which I inadvertently omitted from my declaration dated May 19, 2019.
3. Annexed hereto as **Exhibit P** is a fax transmission of February 24, 2016, from James Cox by which he announced the selection of Judith Brusgard as Chief of the Property Damage Division.

Dated: New York, New York
June 20, 2019


Kenechukwu Okoli

From: Cox, James
Sent: Wednesday, February 24, 2016 2:45 PM
To: #BLA-Law & Adjustment <#BLA-Law&Adjustment@comptroller.nyc.gov>; #ENG-Engineering <#ENG-Engineering@comptroller.nyc.gov>
Subject: Announcement - Property Damage Division Chief

We are very pleased to announce that Judith Brusgard has been selected to be the Chief of the Property Damage Division. Having started her career in Property Damage in 1988, Judith brings a significant amount of experience to the position. Please join us in congratulating Judith on her promotion.

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